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 19 Attorneys for Defendants

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 NAVAJO HEALTH FOUNDATION – SAGE  
 23 MEMORIAL HOSPITAL, INC. (doing business  
 24 as “Sage Memorial Hospital”); an Arizona non-  
 25 profit corporation

26 Plaintiff,

27 v.

28 RAZAGHI DEVELOPMENT COMPANY,  
 LLC; a Nevada limited liability company (doing  
 business as “Razaghi Healthcare”), et al.,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**JOINT STIPULATION TO  
 EXTEND TIME FOR  
 DEFENDANTS TO FILE REPLY  
 IN SUPPORT OF DEFENDANTS’  
 MOTION TO DISMISS THIRD  
 AMENDED COMPLAINT,  
 MOTION TO STRIKE  
 PORTIONS OF THIRD  
 AMENDED COMPLAINT, OR IN  
 THE ALTERNATIVE, MOTION  
 FOR A MORE DEFINITE  
 STATEMENT [ECF NO. 201]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, pursuant to FRCP 6 and LR IA 6-  
 1 and subject to this Court’s approval, that Defendants Razaghi Development Company,

1 LLC, Ahmad Razaghi, and Tausif Hasan (collectively “Defendants”) shall have an  
2 extension of time, up to and including October 21, 2022 to submit their reply in support of  
3 Defendants’ Motion to Dismiss Third Amended Complaint, Motion to Strike Portions of  
4 Third Amended Complaint, or in the Alternative, Motion for a More Definite Statement  
5 (“Motion to Dismiss”) (ECF No. 201 filed August 19, 2022).

6 The parties stipulate to the above extension because lead defense counsel, Kris  
7 Leonhardt, was in an accident on September 21, 2022 which will require surgery. The  
8 additional time requested herein will permit Ms. Leonhardt time to recover from her  
9 accident and surgery, attend to personal matters, and meet current deadlines in other matters,  
10 as well as respond to the issues raised in Plaintiff’s response. This is the first request to  
11 extend Defendants’ deadline to file their reply in support of Defendants’ Motion to Dismiss.

12 This request is made in good faith and not for the purpose of delay. Neither party  
13 will be prejudiced by the requested extension.

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For the reasons set forth above, the parties ask the Court to approve this stipulation and allow Defendants up to and including **October 21, 2022** to submit their reply in support of Defendants' Motion to Dismiss Third Amended Complaint, Motion to Strike Portions of Third Amended Complaint, or in the Alternative, Motion for a More Definite Statement (ECF No. 201). The parties have so stipulated.

RESPECTFULLY SUBMITTED this 22nd day of September 2022.

/s/ Paul S. Padda (with permission)

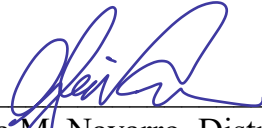
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/s/ Nermana Pehlic

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Kris Leonhardt, Esq.  
Nermana Pehlic, Esq.  
Jeffrey D. Winchester, Esq.  
*Counsel for Defendants*

**IT IS SO ORDERED.**

Dated this 22 day of September, 2022

  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

FISHER & PHILLIPS LLP  
3200 N. Central Avenue, Suite 1550  
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**CERTIFICATE OF SERVICE**

This is to certify that on September 22, 2022, the undersigned, an employee of Fisher & Phillips LLP, electronically filed the Joint Stipulation to Extend Time for Defendants to Respond to Plaintiff's Third Amended Complaint [ECF No. 192] with the U.S. District Court, and a copy was electronically transmitted from the Court to the e-mail address on file for:

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